

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA)	
)	
Petitioner,)	
)	
v.)	Civil Case No. 25-mc-00011 (ADC-GLS)
)	
ANA IZQUIERDO,)	
)	
Respondent.)	

**SUBMISSION OF STATEMENT
OF TLS MANAGEMENT & MARKETING SERVICES LLC**

Respondent, by and through her undersigned counsel, respectfully submits to the Court the attached document, consisting of a letter from counsel for TLS Management & Marketing Services LLC (“TLS”) with two exhibits: (1) a notice to TLS from the Internal Revenue Service (“IRS”), and (2) a declaration. The document address TLS’s relationship with Respondent. Respondent respectfully contends that this submission supports her assertion on behalf of TLS of the attorney-client privilege and work-product privilege. Respondent further contends that the IRS notice supports her assertion of the Fifth Amendment privilege.

Date: March 27, 2025.

Respectfully submitted,

NEILL SCHWERIN BOXERMAN, P.C.

By: /s/ Michelle F. Schwerin
Sanford J. Boxerman #34736MO
Michelle Feit Schwerin #62882MO
120 S. Central Avenue, Ste 725
St. Louis, MO 63105

Telephone: (314) 949-1864

Facsimile: (314) 949-1864

boxerman@nsbpc.com

schwerin@nsbpc.com

MBA LAW

By: /s/ Mayte Bayolo-Alonso

Mayte Bayolo-Alonso USDC No. 308109

PO Box 11204

San Juan, PR 00910

Telephone: (787)448-5544

maytebayololaw@gmail.com